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Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
GUSTAVO COLIN LOPEZ, )  
aka MICHAEL LOPEZ-FLORES, )  
 )  
Defendant. )

No. 10-00823-DLJ  
No. 10-00932-DLJ

STIPULATION FOR AUTHORIZATION  
TO PROVIDE SEALED PLEA  
AGREEMENT TO DEFENSE COUNSEL

The defendant GUSTAVO COLIN LOPEZ (aka MICHAEL LOPEZ-FLORES), represented by Vicki H. Young, Esq., and the government, represented by Thomas A. Colthurst, Assistant United States Attorney, respectfully request that the Court authorize the government to provide counsel for the defendant in this matter with a copy of the plea agreement entered into between the government and Manual Villa and filed under seal on August 2, 2011. It is anticipated that Villa could be a witness in a sentencing hearing in this matter and that the defendant's counsel would be entitled to the plea agreement as Giglio material. The parties also

1 agree that the plea agreement will remain under seal in the Clerk's office.

2  
3 SO STIPULATED:

4  
5 Dated: November 14, 2012

/S/  
\_\_\_\_\_  
Thomas A. Colthurst  
Assistant United States Attorney

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8 Dated: November 14, 2012

/S/  
\_\_\_\_\_  
Vicki H. Young, Esq.  
Attorney for Defendant

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11 Accordingly, for good cause shown, the Court HEREBY ORDERS that a copy of the plea  
12 agreement for Manual Villa filed on August 2, 2011, may be provided to counsel for the  
13 defendant in *United States V. Gustavo Colin Lopez*, and *United States v. Michael Lopez-Flores*,  
14 subject to the following:

15 IT IS FURTHER ORDERED that the plea agreement shall not be disseminated or  
16 disclosed to anyone other than the named defendants or their counsel, or the staff of their counsel  
17 (secretaries, paralegals, clerical staff and attorneys employed by counsel and/or counsel's law  
18 firm and nonemployees engaged by counsel and under counsel's supervision who assist in  
19 counsel's representation of one of the named defendants), except upon the express authorization  
20 of this Court. Information obtained from the plea agreement may be discussed with third parties  
21 only to the extent necessary for the investigation and preparation of a named defendant's defense,  
22 *provided* that in no case shall the discussion of such information involve the disclosure to any  
23 third party of the document that is the source of the information or that the source of the  
24 information is a plea agreement or other document filed under seal.

25 IT IS FURTHER ORDERED that the plea agreement that is currently under seal shall  
26 remain sealed after the attorneys have been provided copies.

27 IT IS FURTHER ORDERED that any attorney receiving the plea agreement is not to  
28 disclose any information therein other than to prepare for trial and for the defense of his/her

1 client.

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3  
4 DATED: FFB FG

  
THE HONORABLE D. LOWELL JENSEN  
United States District Judge